

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

**This Document Relates to the TPP Trial
Claims**

MDL No. 2875

Honorable Renée Marie Bumb
Chief District Court Judge

**TPP TRIAL DEFENDANTS’
NOTICE OF MOTION FOR SUMMARY JUDGMENT¹**

Defendants are entitled to summary judgment for multiple reasons.

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel will bring Defendants’ Motion for Summary Judgment. Defendants will ask for entry of an order granting summary judgment in favor of Defendants and dismissing the TPP Trial claims in their entirety, with prejudice.

¹ This Motion for Summary Judgment concerns the claims designated in Case Management Order No. 32 (the “TPP Trial Claims”); specifically, the claims of Plaintiff MSP Recovery Claims, Series LLC, as class representative of TPP Breach of Express Warranty subclass b, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a (collectively, the “TPP Classes”), against the TPP Trial Defendants. (ECF 2343 at 1-2.) Defendants were previously granted summary judgment on the claims asserted by Implied Warranty subclass d. (ECF 2695 at 5.) In filing this motion, Defendants do not waive any arguments in favor of summary judgment with respect to any other claims asserted by any Plaintiff as to any Defendant(s) in this multidistrict litigation.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Brief submitted herewith, the L.R. 56.1 Statement of Material Facts Not in Dispute, and the Declaration of Nina Rose, Esq., together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: June 27, 2025

Respectfully submitted,

/s/ Jessica Davidson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 27, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: June 27, 2025

Respectfully submitted,

/s/ Jessica Davidson

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